

# ***EXHIBIT A***

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April 22, 2003

Windell E. Cooper Porter, Esquire  
1219 W. Main Street  
Norristown, PA 19401

**FILE COPY**

Re: Earl L. Tabron, Jr.  
vs. RadioShack, John V. Roach,  
George Kunney And Darryl J. Ferrara  
Our File No.: 90799

Dear Ms. Cooper Porter:

Enclosed please find defendant, George Kuney's initial disclosures pursuant to Rule 26 of the Federal Rules of Civil Procedure.

In addition, enclosed please find George Kuney's interrogatories and requests for production of documents directed to plaintiff which we ask that you respond to pursuant to the Federal Rules of Civil Procedure.

Thank you for your attention to this matter.

Very truly yours,

Daniel C. Moraglia

DCM/ht  
Enclosure

cc: David A. Rapuano, Esquire  
Michael W. Herbert, Esquire

***EXHIBIT “B***

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

EARL L. TABRON, JR.,

Plaintiff,

CIVIL ACTION

v.

NO. 02-2695

RADIO SHACK, et al.,

Defendants.

**ORDER**

AND NOW, this 30<sup>th</sup> day of April, 2003, upon consideration of the motion of counsel for plaintiff to withdraw, it is hereby **ORDERED** that said motion is **GRANTED**.

It is further **ORDERED** that the following scheduling order is entered:

1. All discovery in this case is to be completed by July 31, 2003.
2. All dispositive motions are due five (5) days after the discovery period.
3. The case will be placed in the trial pool (published in The Legal Intelligencer) on September 2, 2003.
4. At least seven (7) days prior to the case being listed in the pool as set forth in paragraph 3, all parties will file their respective pretrial memorandums, which shall include all items set forth in paragraph 8 of the Pretrial and Trial Procedures Before Judge Ronald L. Buckwalter (a copy of which is attached to this order). A copy of the pretrial memorandums shall be sent to opposing counsel and unrepresented parties. Unless otherwise ordered, counsel need not submit a pretrial memorandum, if a dispositive motion is filed, until after the Court's ruling

on the motion. If necessary, pretrial memos are due seven (7) days after the Court's ruling on the motion.

5. If requested by counsel, the court will hold a pretrial conference, but no such conference will ordinarily be scheduled in the absence of a request.

All parties, unrepresented and represented by counsel, must comply with the aforementioned scheduling order, the local rules of court, and the Federal Rules of Civil Procedure.

BY THE COURT:



RONALD L. BUCKWALTER, J.

Copies by FAX from chambers on 4/30/03 to:

Windell E. Cooper Porter, Esq.	(610) 376-8650
Daniel C. Moraglia, Esq.	(215) 561-6661
Michael W. Herbert, Esq.	(609) 924-8732
David A. Rapuano, Esq.	(856) 673-7145

Copy by Mail from chambers on 4/30/03 to:

Earl L. Tabron, Jr. (Plaintiff)  
7329 Ogontz Avenue  
Philadelphia, PA 19138

***EXHIBIT “C”***

**BENNETT, BRICKLIN & SALTZBURG LLP**

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June 16, 2003

**VIA CERTIFIED MAIL - RETURN**  
**RECEIPT REQUESTED**

Mr. Earl L. Tabron, Jr., Pro Se  
7329 Ogontz Avenue  
Philadelphia, PA 19138

Re: Earl L. Tabron, Jr.  
vs. RadioShack, John V. Roach,  
George Kunney And Darryl J. Ferrara  
Our File No.: 90799

Dear Mr. Tabron

On April 22, 2003, I sent to your then attorney, Windelle Cooper-Porter George Kuney's initial disclosures pursuant to Rule 26 of the Federal Rules of Civil Procedure as well as a set of interrogatories and request for production of documents directed to you which you are required to respond to pursuant to Rules 33 and 34 of the Federal Rules of Civil Procedure.

It is my understanding that Ms. Cooper-Porter is no longer your attorney. However, it is still your responsibility to provide your initial disclosures as well as responses to our written discovery. To date, we have not received your initial disclosures or responses to our discovery which are now long overdue. If we do not receive your initial disclosures and responses to written discovery by June 23, 2003, we will file a motion to compel with the court and will seek reimbursement for the cost associated with the filing of the motion. I enclose another set of our written discovery requests for your convenience.

Thank you for your attention to this matter.

Very truly yours,

DCM/rdt-Encl

Daniel C. Moraglia